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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

11 SHIELDIO, INC.,  
12 Plaintiff,  
13 vs.  
14 SIMON I. BAIN, an individual,  
15 Defendant.

Case No. 3:19-cv-00700-MMD-WGC

**STIPULATION AND ORDER FOR  
DISMISSAL WITH PREJUDICE**

19 Plaintiff ShieldIO, Inc., (“Plaintiff”), and Defendant Simon I. Bain (“Defendant” and  
20 jointly with Defendant, the “Parties”) by and through their respective undersigned counsel of  
21 record, stipulate and agree that an order may be entered dismissing this, and each of the claims  
22 and causes of action herein, with prejudice, with each party to bear its own attorneys’ fees and  
23 costs.

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1           The Parties stipulate and agree that this Stipulation resolves, in their entirety, the Parties'  
2 claims, causes of action, allegations, complaints, and/or grievances related to and/or arising out of  
3 the above-captioned litigation, whether known or unknown, including, without limitation, any and  
4 all claims for attorneys' fees or costs, experts' fees or costs, or consultants' fees or costs.

5           Dated: April 20, 2020

6           KNOMAD LAW

7  
8           By: /s/ Christopher McElwain  
9           Christopher R. McElwain (CA Bar  
10           289132)  
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20           *Attorneys for Defendant Simon Bain*

21           Dated: April 20, 2020

22           SNELL & WILMER L.L.P.

23           By: /s/ Wayne Klomp  
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36           **IT IS SO ORDERED.**

37           

38           UNITED STATES DISTRICT JUDGE

39           DATED: April 23, 2020

**CERTIFICATE OF SERVICE**

I hereby certify that on this date, I electronically filed the foregoing with the Clerk of Court for the U.S. District Court, District of Nevada by using the Court's CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

DATED: April 22, 2020.

/s/ Lara J. Taylor  
An Employee of Snell & Wilmer L.L.P.

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